

Exhibit JJ

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.

19-2875

8 ***** (RBK/JS)

9 THIS DOCUMENT APPLIES TO ALL

10 CASES HON ROBERT B.
11 KUGLER

12 *****

13 - CONFIDENTIAL INFORMATION -
14 SUBJECT TO PROTECTIVE ORDER

15

16

17 Remote Videotaped via Zoom
18 Deposition of JIE WANG, commencing at 7:01
19 a.m. China Standard Time, on the 18th of May,
20 2021, before Maureen O'Connor Pollard,
21 Registered Diplomate Reporter, Realtime
22 Systems Administrator, Certified Shorthand
23 Reporter.

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25 GOLKOW LITIGATION SERVICES
26 877.370.3377 ph | 917.591.5672 fax
27 deps@golkow.com

28

29

1 that notified you?

2 A. It is -- it's the admin office
3 or the -- yeah, the corporate office of ZHP.

4 Q. Was it Maggie Kong?

5 A. Yes, correct.

6 Q. And did she send you an e-mail
7 to notify you that you would have your
8 deposition taken?

9 A. I think so, yes.

10 Q. And after you learned that you
11 were going to have your deposition taken, did
12 you speak with any of your colleagues at ZHP
13 about having your deposition taken?

14 A. Yes, I have.

15 Q. And who did you speak with?

16 A. I remember there were quite a
17 few.

18 Q. Okay.

19 A. Yeah.

20 Q. And so why don't you start from
21 the beginning and tell me, if you can
22 remember, who are the folks that you spoke
23 with?

24 A. Okay. Let me try to recall the

1 main persons.

2 I spoke with Karen Xu. I spoke
3 with Qimao Chen.

4 Q. And let me stop you there.

5 Qimao Chen, was that the name
6 that you mentioned?

7 A. Yes.

8 Q. And what department does he or
9 she work in?

10 A. This is a gentlemen. He is
11 the -- one of the vice presidents of ZHP
12 responsible for finished dose division.

13 Q. Okay. And Karen Xu, what
14 department does she work in?

15 A. She works in the marketing and
16 sales department of API with ZHP.

17 Q. Okay. And aside from those two
18 people, who else did you speak with?

19 A. I spoke with Ms. Qian, Q-I-A-N.
20 She is a director with the finance department
21 of ZHP.

22 Q. Okay. Who else?

23 A. There was also Wang Cheng,
24 Mr. Cheng, C-H-E-N-G. He's with the

1 corporate quality assurance of ZHP.

2 Q. Anyone else that you can
3 remember?

4 A. I also spoke with Jonson Zhong,
5 Z-H-O-N-G. He's the director of the
6 marketing and sales of API with ZHP for
7 India.

8 Q. Okay. Is that it?

9 A. There are a couple of more. I
10 don't remember -- yeah, I mean, there are a
11 couple of more. I -- yeah, those are the
12 main persons.

13 Q. Okay. Did you ever speak with
14 Baohua Chen?

15 A. No, I have not.

16 Q. Okay. And what were the
17 purposes of the discussions that you've had
18 with the individuals that you just named?

19 A. I was having a conversation
20 with them in order to learn something as a
21 part of the preparation for this deposition.

22 Q. Are you referring to the topics
23 that you were designated to speak on that
24 were identified in Exhibit A?

1 June 19, 2018 an appointment for a Skype
2 meeting to occur on June 22, 2018.

3 A. Okay.

4 Q. And then underneath that he
5 has -- he indicates, you know, "Follow up on
6 last week call with minutes attached."

7 Do you see that?

8 A. Okay. Yes, I do see it. Okay.

9 Q. And then under that it says,
10 "Dear Cai and Novartis colleagues, Following
11 are the minutes and actions agreed from
12 meeting held on 15 Jun 2018 between Novartis
13 management and Huahai management with regards
14 to Valsartan API impurity issue." And then
15 in parentheses it says "(Huahai)."

16 And then after that it says,
17 "Cai, please share these with your CEO and
18 management team as appropriate."

19 The CEO of ZHP at the time that
20 this e-mail was sent was Baohua Chen,
21 correct?

22 A. If he was referring as the
23 president, because we -- Baohua Chen is the
24 president of ZHP.